

August 1, 2023

The Honorable Lynn Adelman  
United States District Court  
Eastern District of Wisconsin

**VIA ECF**

RE: *Huber v. Beth, et al.*, Case No. 21-CV-969  
*Grosskreutz v. City of Kenosha, et al.*, Case No. 21-CV-1192

Dear Judge Adelman:

As explained in the parties' amended joint report regarding their Rule 26(f) conference (ECF #89, p. 5), the parties have been working together on a mutually agreeable protocol for discovery production (including electronically stored information) by August 1, 2023. The parties conducted a meet and confer yesterday and agreed that Defendants would propose a list of search terms and appropriate custodians by August 14th, and the Plaintiff will respond to the proposal by August 21st. The parties plan to then meet and confer and timely alert the Court regarding any unresolved differences. Please let us know if there are any questions or concerns, and/or how the parties can otherwise comply with the Court's orders. Thank you.

Best regards,

STAFFORD ROSENBAUM LLP

*Electronically signed by Kyle W. Engelke*

Kyle W. Engelke

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cc: Counsel of Record – 21CV969 (via ECF)  
Counsel of Record – 21CV1192 (via ECF)

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**Madison Office**

222 West Washington Avenue 608.256.0226  
P.O. Box 1784 888.655.4752  
Madison, Wisconsin Fax 608.259.2600  
53701-1784 www.staffordlaw.com

**Milwaukee Office**

1200 North Mayfair Road 414.982.2850  
Suite 430 888.655.4752  
Milwaukee, Wisconsin Fax 414.982.2889  
53226-3282 www.staffordlaw.com